

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY S. VAUGHN, individually and on behalf	:
of those Class Members similarly situated,	:
	:
Plaintiff,	:
	:
-against-	:
	:
LEEDS, MORELLI & BROWN, P.C., LEEDS,	:
MORELLI & BROWN, L.L.P., LEEDS &	:
MORELLI, LEEDS, MORELLI & BROWN,	:
PRUDENTIAL SECURITIES, INC.,	:
PRUDENTIAL FINANCIAL, INC., LENARD	:
LEEDS, STEVEN A. MORELLI, JEFFREY K.	:
BROWN, JAMES VAGNINI, FREDERIC DAVID	:
OSTROVE, ROBERT JOHN VALLI, JR.,	:
DISCRIMINATION ON WALL STREET, INC.	:
DISCRIMINATION ON WALL STREET,	:
MANHATTAN, INC., JOHN DOES, 1-10 AND	:
JANE DOES, 1-10 a fictitious designation for	:
presently unknown licensed attorneys, professionals	:
and/or unknown persons or entities,	:
	:
Defendants.	:
-----	X

Case No. 04 Civ. 8391 (DLC)

**NOTICE OF
CROSS-MOTION**

Oral Argument Requested

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 4, the affidavit of Angela M. Roper, Esq., dated May 23, 2005, the accompanying Memorandum of Law, and all other papers and proceedings herein, plaintiff will move this Court, before the Honorable Denise Cote, on a date convenient to this Court, in Courtroom 11B of the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order directing service upon those defendants who have not yet been served, or, alternatively, for good cause shown, extending the period of service for those defendants not yet served. The basis for the motion is set forth in accompanying Memorandum of Law.

Plaintiff requests oral argument on this motion.

Dated: New York, New York
May 24, 2005

LIDDLE & ROBINSON, L.L.P.

By: 

Blaine H. Bortnick (BH 3686)

Jeffrey L. Liddle (JL 8256)

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JEFFREY S. VAUGHN, individually and on behalf of
those Class Members similarly situated,

Plaintiff,

-against-

LEEDS, MORELLI & BROWN, P.C., LEEDS, MORELLI
& BROWN, L.L.P., LEEDS & MORELLI, LEEDS, MORELLI
& BROWN, PRUDENTIAL SECURITIES, INC.,
PRUDENTIAL FINANCIAL, INC., LENARD LEEDS,
STEVEN A. MORELLI, JEFFREY K. BROWN, JAMES
VAGNINI, FREDERIC DAVID OSTROVE, ROBERT JOHN
VALLI, JR., DISCRIMINATION ON WALL STREET, INC.
DISCRIMINATION ON WALL STREET, MANHATTAN,
INC., JOHN DOES, 1-10 AND JANE DOES, 1-10 a fictitious
designation for presently unknown licensed attorneys,
professionals and/or unknown persons or entities,
Defendants.

NOTICE OF CROSS-MOTION

Attorneys for Plaintiff

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